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January 12, 2021

## VIA ECF AND ELECTRONIC MAIL

Honorable Cecelia G. Morris  
United States Bankruptcy Court  
Southern District of New York  
355 Main Street  
Poughkeepsie, NY 12601-3315

Re: *Picard v. Carol L. Kamenstein, et al.*, No. 10-04469 (Bankr. S.D.N.Y.)

Dear Chief Judge Morris:

We are counsel to Irving H. Picard, as trustee for the substantively consolidated SIPA liquidation of Bernard L. Madoff Investment Securities LLC under the Securities Investor Protection Act, 15 U.S.C. §§ 78aaa–III, and the chapter 7 estate of Bernard L. Madoff. We write to advise your Honor that the parties have reached a settlement in principle in the above-captioned case and intend to memorialize the settlement by January 20, 2021. Accordingly, the parties request that the following deadlines and conferences be adjourned as they are no longer necessary:

- deadlines for the parties' cross-motions for summary judgment, including oral argument scheduled for January 27, 2021, pursuant to the Stipulation and Order Regarding Briefing Schedule on Defendant's Motion for Summary Judgment and Plaintiff's Cross-Motion for Summary Judgment, ECF No. 123; and
- pretrial deadlines and final pretrial conference also scheduled for January 27, 2020 pursuant to the Order Signed Setting Pre-Trial Deadlines And Scheduling Final Pre-Trial Conference, ECF No. 100, and Amended Notice of Hearing for Pre Trial Conference, ECF No. 112.

Respectfully submitted,

/s/ *Nicholas J. Cremona*

Nicholas J. Cremona  
Partner

cc: Helen Davis Chaitman, Esq.